

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
MICHAEL WILLIAM CROUTZ	:	CASE NO. 1-20-01617-HWV
aka MICHAEL W. CROUTZ	:	
CHRISTEN MARIE CROUTZ	:	CHAPTER 13
aka CHRISTEN M. CROUTZ	:	
fka CHRISTEN MARIE LAUGHMAN	:	
Debtors	:	
	:	
	:	
FREEDOM MORTGAGE CORPORATION	:	
Movant	:	
	:	
v.	:	
	:	
MICHAEL WILLIAM CROUTZ	:	
aka MICHAEL W. CROUTZ	:	
CHRISTEN MARIE CROUTZ	:	
aka CHRISTEN M. CROUTZ	:	
fka CHRISTEN MARIE LAUGHMAN	:	
Respondents	:	

**DEBTORS' RESPONSE TO MOTION OF
FREEDOM MORTGAGE CORPORATION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come Debtors, Michael William Croutz and Christen Marie Croutz, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

1. Admitted.
2. Admitted.
3. Admitted in part and denied in part. Debtors have no knowledge as to the holder of the mortgage. Strict proof is demanded.
4. Admitted in part and denied in part. See response to paragraph 6.
5. Admitted.

6. Admitted in part and denied in part. It is admitted that Debtors are behind on their monthly payments. The exact amount of the arrearage is unknown. Strict proof is demanded.

7. Admitted in part and denied in part. The fair market value of the property is \$145,900.00 in accordance with the market analysis attached to Debtors' Schedules. The amount owed to the Movant in accordance with Proof of Claim No. 8 is \$134,754.77. Accordingly, there is an equity cushion providing adequate protection to Movant. Further, Debtors are providing adequate protection through regular post-petition payments. To the extent that the post-petition payments are in arrears, Debtors will make an offer to bring the payments current in the near future.

8. Admitted in part and denied in part. Said fees and costs are only owing if Movant proves Debtors were behind on their monthly payments at the time of the filing of the Motion for Relief.

9. Denied. See response to paragraph 7.

10. Denied. All communication should go through Debtors' counsel.

11. Denied. There is no reason why Bankruptcy Rule 4001(a)(3) should not apply.

12. Admitted.

13. Admitted.

WHEREFORE, Debtors respectfully request that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum
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Attorney for Debtors

DATED: 3-26-21

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF FREEDOM MORTGAGE CORPORATION FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J DEHART III ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

dehartstaff@pamd13trustee.com

MARIO HANYON, ESQUIRE
BROCK & SCOTT, PLLC
COUNSEL FOR MOVANT
VIA E-SERVICE

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For Debtors

DATED: 3/26/2021